

DAVID L. ANDERSON (CABN 149604)
United States Attorney

HALLIE HOFFMAN (CABN 210020)
Chief, Criminal Division

KAREN KREUZKAMP (CABN 246151)
STEPHEN MEYER (CABN 263954)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7014
FAX: (415) 436-7234
Karen.Kreuzkamp@usdoj.gov
Stephen.Meyer@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	NO. 17-CR-0068 EJD
)	
v.)	GOVERNMENT'S
)	SENTENCING MEMORANDUM
JOSE DAVID ABREGO-GALDAMEZ,)	
)	Sentencing Date: September 16, 2019
Defendant.)	Time: 1:30 p.m.
)	
)	
)	

The government respectfully submits this sentencing memorandum to request that the Court sentence defendant Jose David Abrego-Galdamez to 36 months of imprisonment, which should be imposed to run consecutively to the sentence imposed in 15-CR-00567 (BLF), followed by a three-year term of supervised release and a \$100 special assessment. This

//

//

//

//

1 recommendation is consistent with the parties' plea agreement, which considered the unique
2 litigation risks to both parties based on the prior plea agreement.

3 Dated: September 9, 2019

4 DAVID L. ANDERSON
5 United States Attorney

6 _____
7 /s/
8 STEPHEN MEYER
9 KAREN KREUZKAMP
10 Assistant United States Attorneys
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28